

Ser. No. 09/673,897
Internal Docket No. PF980020

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Remarks/Arguments

Claims 1-10 are pending. Claims 1-10 stand rejected under 35 USC 102(b) as being anticipated by Zou. (United States Patent No. 6,160,796). Applicants traverse these rejections, and request their reconsideration and removal for at least the following reasons.

A claim is anticipated pursuant to 35 U.S.C. 102 only if each and every element set forth in the claim is found, either expressly or inherently described, in a single prior art reference. *See, Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987)). In other words, in order for a prior art reference to anticipate a claim, "the identical invention must be shown in as complete detail as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). And, each of the claim elements must be arranged as required by the claim. *See, In re Bond*, 910 F.2d 831, 15 USPQ2d 1566 (Fed. Cir. 1990). Zou fails to teach each and every one of the limitations of the pending claims, and hence fails to anticipate any of the pending claims as a matter of law.

The present invention relates to a system having a number of devices in a network, wherein each device includes a registry. The registry of a device holds a list of objects local to this device. The objects can be, for example, device control modules (e.g., a VCR control module), functional modules within a device (e.g., a tuner), applications (e.g., a user interface), and other software modules (e.g., a messaging system, an isochronous stream management module, etc...).

According to the present invention, when an object of a device makes a query, for example a request for all video sources on the network, this query is sent to the local registry. The local registry then sends queries to all other registries of the network, collates the responses (with its own response if applicable) and sends a response back to the requesting object. Thus, there may be multiple objects corresponding to a given request. In that regard, Claim 1 recites:

formulating, by a local object, a request for a list of objects, the request being transmitted to the single local registry of the device hosting the local object;

Ser. No. 09/673,897
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propagating the request through the local registry
to distant registries;
collecting the responses to the request by the
distant registries and the response of the local registry;
and
transmitting the responses collected to the local
object having formulated the initial request.

Zou fails to teach each of these steps, and hence fails to anticipate at least Claim 1 of the subject application.

For example, Zou fails to teach the recited, "formulating, by a local object, a request for a list of objects, the request being transmitted to the single local registry of the device hosting the local object" step of Claim 1. The Office action cites col. 20, lines 1-42 as allegedly teaching the recited formulating step. However, a detailed reading of the "Service Registry" discussion beginning at col. 19 line 60, and ending at col. 20, line 42 of Zou, shows that Zou fails to teach or suggest any such step. In fact, Zou does not mention that a request for a list of objects, formulated by a local object, is transmitted to a local registry. Rather, Zou merely discloses that an object can query a service registry object to locate a particular service or device object. Querying for a particular device is distinguishable from formulating a request for a list of objects.

Further, Zou fails to teach the step of, "propagating the request through the local registry to distant registries" recited in Claim 1. The Office action argues that Zou teaches "each service registry 216 works with others to ensure that entries are replicated or available by others." However, Applicant submits that whether or not the Zou registries work together to ensure entries are replicated does not correspond to the claimed step of propagating a request through the local registry to distant registries. The former involves communicating entries to be replicated; the latter recites propagating a request through a local registry to distinct registries.

Further yet, Zou fails to teach the additional limitations of "collecting the responses to the request by the distant registries and the response of the local registry". The Office action argues this step is taught by Zou:

Queries to the Service Registry 216 return object
identifiers usable as end point for message
communication. These identifiers may refer to DCMs,
services, or any other entity in the system accessible

Ser. No. 09/673,897
Internal Docket No. PF980020

Customer No. 24498

via the messaging system. The format of the queries allows both sophisticated queries that iterate over the global registry or simple queries that are confined to a local registry.

However, Applicant notes that regardless of whether a simple or sophisticated Zou query is performed, Zou fails to disclose or suggest collecting the responses to the request by the distant registries and the response of the local registry; and then transmitting the collected responses to the local object having formulated the initial request – as is recited by Claim 1.

Accordingly, Applicant submits Zou that fails to anticipate Claim 1, as it fails to teach each and every one of the limitations, including at least: (1) formulating, by a local object, a request for a list of objects, the request being transmitted to the single local registry of the device hosting the local object; (2) propagating the request through the local registry to distant registries; (3) collecting the responses to the request by the distant registries and the response of the local registry; and/or (4) transmitting the responses collected to the local object having formulated the initial request.

In view of the foregoing, Applicant respectfully requests reconsideration and removal of the rejection of Claim 1. Applicant also traverses, and requests reconsideration and removal of the rejections of Claims 2-8 as well, at least by virtue of these claims' ultimate dependency upon a patentably distinct base Claim 1.

With regard to independent Claim 9, it analogously recites, *inter alia*:

means for propagating a request for a list of objects formulated by a local object to the local registries of other devices; and

means for collecting the responses of the registries of the other devices and the response of the local registry and for transmitting the responses to the object having formulated the request.

Accordingly, Applicant submits that present Claim 9 is not anticipated by Zou for at least the reasons set forth above with regard to Claim 1. Reconsideration and removal of the rejection of Claim 9 is requested. Applicant also traverses, and requests reconsideration and removal of the rejection of Claim 10, which depends from patentable base Claim 9.

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CONCLUSION

Having fully addressed the Examiner's rejections it is believed that, in view of the preceding amendments and remarks, this application stands in condition for allowance. Accordingly then, reconsideration and allowance are respectfully solicited. If, however, the Examiner is of the opinion that such action cannot be taken, the Examiner is invited to contact the applicant's attorney at (609) 734-6815, so that a mutually convenient date and time for a telephonic interview may be scheduled.

Respectfully submitted,

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